MEMO

TO	Ken Goldstein, Chief, Pretreatment Section, DWR
	Frank Coolick, Chief, Bureau of
FROM	Hazardous Waste Engineering, DWM DATE July 22, 1983
	TSD Facility Delisting Request, U.S. Army Comm Electr Matl Read Command,
SUBJECT	Fort Monmouth, New Jersey - EPA ID NO. NJD000537274

The subject facility filed a RCRA Part A application in 1980 indicating the activities T01 (treatment in tanks) and S01 (storage in containers). The applicant has subsequently requested delisting to "generator only" status.

According to Mr. Desai, Environmental Engineer, CECOM (June 30, 1983 telecon), the "T01" activity was discontinued in 1981, and had consisted of neutralizaing (D000) wastes in tanks prior to sewering the supernatant.

The facility is eligible for the S01 exclusion from regulations as a TSD facility providing it complies with N.J.A.C. 7:26-9.3; and the BHWE has delisted this activity.

As per the "Interim TSD Declassification Agreement", the T01 delisting request falls under the purview of your office as evidenced by the tank neutralization and subsequent discharge to a sewer system.

Therefore, the BHWE refers the application for delisting of the reported T01 activity to your section for appropriate response. Please reply directly to the company on the BHWE, BIWM and Joel Golumbek, USEPA on said response.

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FC:WN:jb

Attachments



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON DIRECTOR

July 22, 1983

LINO F. PEREIRA
DEPUTY DIRECTOR

Vincent P. Dewar, Facility Engineer U.S. Army Comm Electr Matl Read Command Bldg 167 SELHI-FE Fort Monmouth, New Jersey 07003

RE: Hazardous Waste TSD Facility Classification and Annual Report Requirements (N.J.A.C. 7:26-7.6(f)2) for U.S. Army Comm Electr Matl Read Command, Fort Monmouth, New Jersey, EPA ID NO. NJD000537274

Dear Mr. Dewar:

The Bureau of Hazardous Waste Engineering has reviewed your letter dated March 1, 1983 in which you indicate that the above referenced facility did not treat hazardous waste or store waste for greater than 90 days in calendar year 1982. This letter also follows up on a June 30, 1983 phone conversation between Mr. Desai, Environmental Engineer, CECOM and Mr. Walter Nedick of my staff. As confirmed by Mr. Desai, it is this Bureau's understanding that the above referenced facility seeks to be delisted from classification as a hazardous waste treatment, storage or disposal (TSD) facility to "generator only" status.

According to Bureau records supplied by the USEPA, the RCRA Part A permit application lists the following hazardous waste activities:

- A. (SO1) storage in containers of 1700 gallons;
- B. (TO1) treatment in tanks of 30,000 gallons per day of waste code D000.

As reported by Mr. Desai, the "TO1" activity was discontinued in 1981, and had consisted of neutralizing wastes in tanks prior to sewering the supernatant.

Item A

The Bureau has determined based on the information provided in your letter dated March 1, 1983 and telephone conversation with Mr. Desai that the above referenced facility is eligible for the SO1 "delisting to generator only" status provided the following requirements of N.J.A.C. 7:26-9.3 are complied with:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.